ABBREVIATED PRELIMINARY ASSESSMENT CHECKLIST

This checklist can assist the site investigator determine if an Abbreviated Preliminary Assessment (APA) is warranted. This checklist should document the rationale for the decision on whether further steps in the site investigation process are required under CERCLA. Use additional sheets , if necessary.

Checklist Preparer: Mercedes Padilla (Name/Title) — March 8, 2002 (Date)
Puerto Rico Environmental Quality Board (Address) — (787) 764-8824 (Phone)
(E-mail Address)

Site Name: Puerto Rico Container Co. Limited

Previous Names (if any): Union Camp, International Paper, ABC Container

Site Location: State Road # 2, Km 15.2, Corujo Industrial Park, Hato Tejas (street)
Bayamón (City) — P.R. (State) — 00961 (Zip)

Latitude: 18°24'30"N **Longitude:** 66°11'30"W

Describe the release (or potential release) and its probable nature: On April 1996 Union Camp reported a 200 gallons spill of untreated process waters. In the notification letter they alleged that the process waters did not contain any toxic chemicals, being water based ink its major contaminant. On that letter they informed that correctives mesurements will be taken. During the Site Reconnaissance of June 1, 2000 the company representative did not know about this spill nor if corrective measurements was taken.

Part 1- Superfund Eligibility Evaluation

If all answers are "no" go on to Part 2, otherwise proceed to Part 3.		
1. Is the site currently in CERCLIS or an "alias" of another site?		No
2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?	Yes	
3. Are the hazardous substances potentially released at the site regulated under a statutory exclusion (e.g., petroleum, natural gas liquids, synthetic gas usable for fuel, normal application or fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)?	yes	
4. Are the hazardous substances potentially released at the site excluded by policy considerations (i.e., deferred to RCRA corrective action?		No
5. Is there sufficient documentation to demonstrate that no potential for a release that could cause adverse environmental or human health impacts exists (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, previous HRS score determined, or an EPA approved risk assessment completed)?		No

Please explain all "yes" answer(s), attach additional sheets if necessary:

2. PREQB-UST Program authorized the Puerto Rico Container Company (Union Camp) to remove an 18,000 gallons diesel underground storage tank (UST).
3. Levels of Total Petroleum Hydrocarbons (TPH) and Toluene were detected next to the former diesel UST.

402081

Part 2- Initial Site Evaluation

For Part 2, if information is not available to make a "yes" or "no" response, further investigation may be needed. In these cases, determine whether an APA is appropriate. Exhibit 1 parallels the questions in Part 2. Use Exhibit 1 to make decisions in Part 3.

If all answer is "no" to any of the questions 1, 2, or 3, proceed directly to Part 3.	**Yes**	**No**
1. Does the site have a release or a potential to release?	yes	
2. Does the site have uncontained sources containing CERCLA eligible substances?	yes	
3. Does the site have documented on-site, adjacent, or nearby targets?	yes	

If the answers to questions 1, 2, and 3 above were all "yes" then answer the questions below before proceeding to Part 3.	**Yes**	**No**
4. Does documentation indicate that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site?		no
5. Is there an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site?		no
6. Is there an apparent release and no documented on-site targets immediately adjacent to the site, but there are nearby targets (e.g., targets within 1 mile)?	yes	
7. Is there no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site?	Refer below to note # 7.	

Notes:

5. There is a new development under construction contiguous to the site.

7. Hazardous substances has been releases into the environment. There are uncontained sources (soil contamination) of CERCLA hazardous substances and there is a potential to release with targets in a karst aquifer.

EXHIBIT 1
SITE ASSESSMEMENT DECISION GUIDELINES FOR A SITE

Exhibit 1 identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. You will use Exhibit 1 in determining the need for further action at the site, based on the answers to the questions in Part 2. Please use your professional judgment when evaluating a site. Your judgment may be different from the general recommendations for a site given below.

Suspected/Documented Site Conditions		**APA**	**Full PA**	**PA/SI**	**SI**
1. There are no releases or potential to release.		Yes	No	No	No
2. No uncontained sources with CERCLA-eligible substances are present on site.		Yes	No	No	No
3. There are no on-site, adjacent, or nearby targets.		Yes	No	No	No
4. There is documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site.	Option 1: APA ⇒ SI	Yes	No	No	Yes
	Option 2: PA/SI	No	No	Yes	NA
5. There is an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site.	Option 1: APA ⇒ SI	Yes	No	No	Yes
	Option 2: PA/SI	No	No	Yes	NA
6. There is an apparent release and no documented on-site targets and no documented targets immediately adjacent to the site, but there are nearby targets. Nearby targets are those targets that are located within 1 mile of the site and have relatively high likelihood of exposure to hazardous substances migration from the site.		No	Yes	No	No
7. There is no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site.		No	Yes	No	No

Part 3 – EPA Site Assessment Decision
When completing Part 3, use Part 2 and Exhibit 1 to select the appropriate decision. For example, if the answer to question 1 in Part 2 was "no", then an APA may be performed and the "NFRAP" box below should be checked. Additionally, if the answer to question 4 in Part 2 is "yes", then you have two options (as indicated in Exhibit 1): Option 1 – conduct an APA and check the "Lower Priority SI" or "Higher Priority SI" box below; or Option 2- proceed with a combined PA/SI assessment.

Check the box that applies based on the conclusions of the APA:

- ☐ NFRAP
- ☐ Higher Priority SI
- ☒ Lower Priority SI
- ☐ Defer to RCRA Subtitle C
- ☐ Defer to NRC
- ☐ Refer to Removal Program- further site assessment needed
- ☐ Refer to Removal Program- NFRAP
- ☐ Site is being addressed as part of another CERCLIS site
- ☐ Other: _____

Regional EPA Reviewer: IOV Zeno
Print Name/Signature

6/13/02
Date

PLEASE EXPLAIN THE RATIONALE FOR YOUR DECISION:

The Puerto Rico Container Co. (PRCC) is an active facility since 1962. As part of their operational history, the company discharged their process waters into the Hondo River through a storm sewer. The company has a permit to operate an Underground Injection Control (UIC) system for the domestic wastewaters that are discharged into an infiltration field. In 1998, the UIC system reported values of over 25,000 gallons per day infiltrated to the soil (Reference 11). Analytical data from the effluent of this UIC system shows lead levels that exceed the Water Quality Standard for Potable Water (Reference 12). A report sent to the PREQB informed of a spill of 200 gallons of untreated process waters at PRCC. During the site reconnaissance, however, PRCC personnel did not know that a spill ever occurred at the facility. PRCC have not taken any actions to remove the contaminated soil at their facility. PRCC uses toluene as raw material and toluene was detected in soil samples obtained during the removal of a diesel underground storage tank.

There is a potential for groundwater contamination to the nearby drinking water wells. The site is located on karst topography where mogotes and sinkholes are present.

Considering all the information gathered, we recommend a Site Inspection at PRCC to confirm onsite contamination, migration of these contaminants, and determine if nearby targets have been exposed to site related contaminants.

Notes:

Abbreviated PA-Checklist

Called at 3:59
Left message

Reference 12

Post-it® Fax Note 7671	Date 6/13/01	# of pages ▶ 7
To Juan Davila	From Mercedes Padilla	
Co./Dept. USEPA	Co. PHERB	
Phone # (212) 637-4341	Phone # (787) 764-5834	
Fax # (212) 637-4360	Fax # (787) 766-0150	

No. 0691 P. 2
Jun. 13. 2001 1:51PM

(UIC) 1997

Union Camp
Puerto Rico

UNION CAMP PUERTO RICO
TRADE NAME FOR PUERTO RICO CONTAINER COMPANY, INC.

5 de Junio de 1997

Sra. Lucinda Ghiglioty, Directora
Área de Calidad de Agua
Junta de Calidad Ambiental
Apartado 11488
Santurce, PR 00910-1488

Asunto: Union Camp Puerto Rico / Puerto Rico Container Co.
104359 UIC
Informe Mensual de Medidas de Flujo

Estimada Sra. Ghiglioty:

Deseamos someter ante su consideración el informe mensual de flujo de aguas sanitarias inyectadas a nuestro sistema subterráneo, como es requerido en nuestro permiso de inyección. Este informe comprende del mes de Mayo de 1997. Adjuntamos copias de las tablas conteniendo las medidas de flujo inyectado diariamente durante este mes.

Cualquier otra información favor de llamar al Tel. 269-2740 o 785-0330 ext. 2740.

Atentamente,

Angel Ortega
Gerente de Producción

CERTIFIED
P 414 027 369
MAIL

lrjar2
AO/jy

ROAD NO. 2, COFRESI IND. PARK • HATO TEJAS, BAYAMON, PR 00961 • TEL. (787) 785-0330 FAX: (787) 785-0378

CARIBTEC LABORATORIES, INC.

PO Box 362242
SAN JUAN, PUERTO RICO 00936-2242

REPORT OF ANALYSIS

036155

CLIENT: Union Camp Puerto Rico

CLIENT CONTACT: Angel Ortega

SAMPLE IDENTIFICATION: 104359 Discharge to UIC

DATE SAMPLED: 09 May 97 TIME: 10:20 am BY: R. Haddock

PARAMETER	UNITS	PERMIT LIMIT	RESULTS	DATE ANALYZED	METHOD
Temperature	Deg C	–	28.1	09 May 97	2550B
pH	S.U	6.0 - 9.0	7.3	09 May 97	4500HB
Oil & Grease	mg/l	–	6	13 May 97	5520B
Nitrate + Nitrite (N)	mg/l	10.0	<0.01	15 May 97	4500NO3E
Cyanide	mg/l	–	<0.005	16 May 97	335.3
Lead	mg/l	–	0.115	13 May 97	3111B
Copper	mg/l	–	0.02	19 May 97	3113B
Mercury	mg/l	–	<0.0001	16 May 97	3112B
Chromium,Total	mg/l	–	0.019	12 May 97	3111B
Nickel	mg/l	–	<0.001	16 May 97	3111B
Zinc	mg/l	–	0.85	16 May 97	3111B
Phenols	mg/l	–	0.037	12 May 97	420.1

COLEGIO DE QUIMICOS DE PUERTO RICO
EDUARDO ROSADO GONZALEZ
LIC. 11273
A 450885

Date Reported: 19 May 97 By: Eduardo Rosado Gonzalez

Tel: 787-764-7666, Fax: 787-763-7733, E-Mail: caribtab@caribe.net, Web Site: http://home.coqui.net/rosadze

No. 0691 P. 4

Union Camp
PUERTO RICO

UNION CAMP PUERTO RICO
TRADE NAME FOR PUERTO RICO CONTAINER COMPANY, INC.

2 de diciembre de 1996

Sra. Lucinia Ghigliotty, Directora
Área de Calidad de Agua
JUNTA DE CALIDAD AMBIENTAL
Apartado 11488
Santurce, Puerto Rico 00910

Asunto: Union Camp Puerto Rico/ Puerto Rico Container Co.
UIC-92-0062
Informe Mensual de Monitoria

Estimada Sra. Ghigliotty:

Adjunto copia de los resultados analíticos de la muestra de aguas sanitarias obtenida el 8 de noviembre de 1996. Como notará todos los resultados están dentro de los límites establecidos.

De haber algún comentario o pregunta de su parte, por favor comuníquese con nuestras oficinas.

Atentamente

Ruth Acevedo
Coordinadora de Seguridad y Ambiental

Jun. 13. 2001 1:51PM

ROAD NO. 2, CORUJO IND. PARK • HATO TEJAS, BAYAMON, PR 00961 • TEL. (809) 785-0330 FAX: (809) 785-0378

No.0691 P. 5

...c Laboratories, Inc.

635422

REPORT OF ANALYSIS

CLIENT: Union Camp Puerto Rico

CLIENT CONTACT: Ruth Acevedo

SAMPLE IDENTIFICATION: 102015 Discharge to UIC

DATE SAMPLED: 08 Nov 96 TIME: 11:40 am BY: J. Orta

PARAMETER	UNITS	RESULTS	DATE ANALYZED	METHOD
Temperature	Deg C	28.1	08 Nov 96	2550B
pH	S.U	7.9	08 Nov 96	4500HB
Oil & Grease	mg/l	<5	19 Nov 96	5520B
Nitrate + Nitrite	mg/l	0.004	12 Nov 96	4500NO3E
Cyanide, Total	mg/l	<0.005	15 Nov 96	335.3
Lead	mg/l	0.343	14 Nov 96	3111B
Copper	mg/l	<0.001	14 Nov 96	3113B
Mercury	mg/l	<0.0001	20 Nov 96	3112B
Chromium, Total	mg/l	<0.001	14 Nov 96	3111B
Nickel	mg/l	<0.001	14 Nov 96	3111B
Zinc	mg/l	<0.02	14 Nov 96	3111B
Phenol	mg/l	0.012	19 Nov 96	420.1

Date Reported: 21 Nov 96

By: _____

ESTADO L... QUIMICO ... Artemio Rivera Orta LIC. 1621

PO Box 362242, San Juan, Puerto Rico 00936-2242, Tel: (787) 754-7566, Fax: (787) 753-7733

Jun.13. 2001 1:51PM

No. 0691 P. 6

Carmen

RECIBIDO
NEGOCIADO CONTROL
[illegible] AGUA
1996 AUG 20 AM 9:19
arg 0384

UNION CAMP PUERTO RICO
TRADE NAME FOR PUERTO RICO CONTAINER COMPANY, INC.

13 de agosto de 1996

Sra. Lucinia Ghigliotty, Directora
Area de Calidad de Agua
JUNTA DE CALIDAD AMBIENTAL
Apartado 11488
Santurce, Puerto Rico 00910

Asunto: Union Camp Puerto Rico/ Puerto Rico Container Co.
UIC-92-0062
Informe Mensual y Trimestral de Monitoría

Estimada Sra. Ghigliotty:

Adjunto le enviamos copia de los resultados analíticos de las muestras de aguas sanitarias obtenida el 12 de julio y el 1 de agosto de 1996, obtenidas a la salida del pozo. Como notará los resultados están dentro de los límites establecidos para todos los parámetros.

De haber algún comentario o pregunta de su parte, por favor comuníquese con nuestras oficinas.

Atentamente

Ruth Acevedo
Coordinadora de Seguridad y Ambiental

1996 AUG 23 AM 11:52

Fold at the dotted line of envelope to the right of the return address

CERTIFIED

P 414 027 579

MAIL

Jun.13. 2001 1:52PM

No.0691 P. 7

Caribtec Laboratories, Inc.

REPORT OF ANALYSIS

035027

CLIENT: Union Camp Puerto Rico

CLIENT CONTACT: Ruth Acevedo

SAMPLE IDENTIFICATION: 100735 UIC Sampling Point Grab

DATE SAMPLED: 01 Aug 96 TIME: 10:35 am BY: R. Haddock

PARAMETER	UNITS	PERMIT LIMIT	RESULTS	DATE ANALYZED	METHOD
pH	S.U	6.0 - 9.0	7.6	07 Aug 96	EPA 150.1
Oil & Grease	mg/l	–	<5	02 Aug 96	EPA 413.1
Nitrate + Nitrite (N)	mg/l	10.0	0.01	07 Aug 96	EPA 353.3
Cyanide	mg/l	–	<0.005	05 Aug 96	EPA 335.3
Lead	mg/l	–	<0.1	05 Aug 96	EPA 239.2
Copper	mg/l	–	0.01	05 Aug 96	EPA 220.2
Mercury	mg/l	–	<0.0001	06 Aug 96	EPA 245.1
Chromium, Total	mg/l	–	<0.001	05 Aug 96	EPA 218.2
Nickel	mg/l	–	<0.01	05 Aug 96	EPA 249.2
Zinc	mg/l	–	0.04	05 Aug 96	EPA 289.2
Phenolid Substances	mg/l	–	0.035	07 Aug 96	EPA 420.1
Temperature	Deg C	–	31.2	01 Aug 96	EPA 170.1

Date Reposted: 08 Aug 96

By:

A 423923

Jun.13. 2001 1:52PM

PO Box 362242, San Juan, Puerto Rico 00936-2242, Tel: (809) 754-7566, Fax: (809) 753-7733